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5 *Counsel for Plaintiffs and*  
6 *the Putative Class*

7 **UNITED STATES DISTRICT COURT**

8 **CENTRAL DISTRICT OF CALIFORNIA**

9 TERESA TURNER, individually and  
on behalf of all others similarly  
situated,

10 Plaintiff,

11 V.

12 NATIONAL NOTARY  
ASSOCIATION,

13 Defendant.  
14  
15  
16  
17  
18  
19  
20

Case No. 2:25-cv-334-FMO-PD

**JOINT STIPULATION TO CONTINUE  
HEARING AND RESET BRIEFING  
SCHEDULE**

Complaint Filed: January 13, 2025

Current Hearing Date: April 10, 2025

New Hearing Date: May 1, 2025

Plaintiffs' Current Deadline: Mar. 20, 2025

Plaintiff's New Deadline: April 10, 2025

Defendant's Reply Date: March 27, 2025

Defendants' New Deadline: April 17, 2025

1 Plaintiff Teresa Turner and Defendant National Notary Association (collectively,  
2 the “Parties”), by and through their respective counsel, stipulate and agree as follows:

3 WHEREAS, on January 13, 2025, Plaintiff commenced this action;

4 WHEREAS, on February 4, 2025, the Parties agreed to a 60-day extension of time  
5 for Defendant to respond to the Complaint, up to and including April 14, 2025 (ECF No.  
6 10);

7 WHEREAS, on February 6, 2025, the Court endorsed the Parties’ Stipulation in  
8 part by extending Defendant’s deadline to respond to the complaint to March 7, 2025  
9 (ECF Nos. 12 &13);

10 WHEREAS, on March 7, 2025, Defendant filed a Motion to Dismiss the FAC (the  
11 “Motion”) (ECF No. 14);

12 WHEREAS, the Parties met, conferred, and agreed to continue the Motion hearing  
13 scheduled on April 10, 2025 to May 1, 2025, and to reset the briefing schedule based on  
14 the new hearing date, which will move Plaintiff’s response deadline from March 20,  
15 2025 to April 10, 2025, and Defendant’s reply deadline from March 27, 2025 to April  
16 17, 2025. This extension will provide Plaintiffs’ counsel with additional time to  
17 investigate the arguments made in the Motion in light of the press of other matters, and  
18 to prepare an appropriate response to the Motion. This extension will also permit  
19 Defendant additional time to file the required notice of constitutional challenge and serve  
20 that notice upon the U.S. Attorney General pursuant to Federal Rule of Civil Procedure

1 5.1. The extension will also appropriately move and modestly extend Defendant's  
2 deadline to prepare their reply brief in support of the Motion, which counsel anticipates  
3 requiring given their own upcoming professional commitments;

4 WHEREAS, the requested continuance and extension are made in a timely  
5 fashion, in good faith, and not for any purpose of delay. Granting this request for a  
6 continuance and extensions of time will not prejudice any party to this matter;

7 WHEREAS, this is the Parties' first request for a continuance and an extension of  
8 time with respect to the Motion hearing and the deadlines for Plaintiff's opposition and  
9 Defendant's reply briefs related to the Motion;

10 WHEREFORE, given the foregoing, Plaintiff and Defendant have conferred and  
11 agree that good cause exists to continue the hearing and extend the Parties' deadlines to  
12 file their response and reply related to the Motion.

13 **STIPULATION**

14 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and  
15 between the Parties that:

16 1. The hearing on Defendant's Motion to Dismiss is continued to May 1, 2025  
17 at 10:00 AM;

18 2. Plaintiff's deadline to file a response to the Motion is extended from March  
19 20, 2025 to April 10, 2025.

3. Defendant's deadline to file a reply is extended from March 27, 2025 to April 17, 2025.

4. This stipulation is without prejudice to the rights, claims, arguments, and defenses of the Parties.

Respectfully submitted,

Dated: March 13, 2025

**HEDIN LLP**

By: /s/ Frank S. Hedin  
Frank S. Hedin (SBN 291289)  
[fhedin@hedinllp.com](mailto:fhedin@hedinllp.com)

*Attorney for Plaintiffs and Putative Class*

Dated: March 13, 2025

**CLARK HILL LLP**

By: /s/ Myriah Jaworski  
Myriah Jaworski (SBN 336898)  
[mjaworski@clarkhill.com](mailto:mjaworski@clarkhill.com)  
*Attorneys for Defendants*

**SIGNATURE CERTIFICATION**

Pursuant to L.R. 5-4.3.4, I hereby attest that all signatories listed above, and on whose behalf this Stipulation is submitted, concur in, and have authorized the filing of this Joint Stipulation.

By: /s/ Frank S. Hedin  
Frank S. Hedin (SBN 291289)